



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNDER SEAL

UNITED STATES OF AMERICA

v.

BASHAWN ALLEN,
a/k/a "Bey," "425," and "425 Money Boy\$,"
(Counts 1, 3)

LARRY ALSTON,
a/k/a "Big Goon,"
(Counts 1, 5)

CHARLES EDWARD DAVIS, JR.,
a/k/a "Cat Daddy" and "Deep in the Game,"
(Counts 1, 2)

ELDRIDGE JERMAINE JACKSON,
a/k/a "Big Head," "4bhead," and "4b,"
(Count 1)

MARK JOSEPH RODRIGUEZ,
a/k/a "Slow Poke,"
(Count 1)

DANDRE PATRICK WALLACE,
a/k/a "Abstract,"
(Counts 1, 4)

and

ISAAC JERMAINE WEATHERSBY,
a/k/a "Big Fist," "CROUSA," "KingCro TC,"
and "Team CRO,"
(Count 1)

Defendants.

1:23-cr-176
Criminal No. ~~1:22-cr-154~~

Count 1:
Conspiracy
(18 U.S.C. § 371)

Counts 2-5:
Advertising a Dog For Use in an
Animal Fighting Venture
(7 U.S.C. 2156(c) and 18 U.S.C. § 49)

SUPERSEDING INDICTMENT

Jal Stricken 10/26/2023

October 2023 Term – at Alexandria

THE GRAND JURY CHARGES THAT:

At all times relevant to this Superseding Indictment:

GENERAL ALLEGATIONS

A. **Animal Fighting Ventures and Dogfighting**

1. The federal Animal Welfare Act defines “animal fighting venture” as “any event, in or affecting interstate or foreign commerce, that involves a fight conducted or to be conducted between at least two animals for purposes of sport, wagering, or entertainment.” It is illegal to sponsor or exhibit an animal in an animal fighting venture. It is also illegal to possess, train, sell, buy, transport, deliver or receive an animal for purposes of having the animal participate in an animal fighting venture.

2. In the United States, dogfighting ventures almost always involve “pit bull”-type dogs, which dogfighters prefer for their compact muscular build, short coat, and the aggression that some display toward other dogs. Generally, a dogfight occurs when two dogs are released by their handlers in a controlled environment to attack each other and fight. The fight ends when one dog withdraws, when a handler “picks up” their dog and forfeits the match, or when one or both dogs die.

3. Because of their conditioning and training, dogs used in animal fighting ventures are almost always housed separately from other dogs—in pens, cages, or on chains—so that they will not hurt or kill other dogs when the handler is absent. Heavy chains are often used when restraining dogs used for fighting purposes to develop neck strength.

4. Generally, dogfighters select the strongest, most capable fighting dogs and selectively breed, sell, and fight only those dogs that display particular traits. Some of these traits are: (1) “gameness” or aggressiveness and propensity to fight other dogs; (2) a willingness to continue fighting another dog despite traumatic and/or mortal injury; and (3) cardiovascular endurance to continue fighting for long periods of time and through fatigue and injury. Dogs displaying these attributes are often bred with other dogs displaying similar traits to enhance the bloodline of these dogs for fighting purposes. Dogfighters generally keep such dogs solely for fighting purposes.

5. Dogs who have been fought may have scars, puncture wounds, swollen faces, or mangled ears. Scars from organized dogfights are commonly found on the face and front legs, as well as on hind ends and thighs.

6. Dogs that lose fights or fail to show “gameness” are often killed. It is not uncommon for dogs that lose matches to be killed in cruel, torturous, and inhumane ways as punishment.

7. Once a dogfighter locates an opponent and agrees upon terms, the match is “hooked,” or set up. The dog then typically undergoes a conditioning process dog handlers refer to as a “keep.” A “keep” is typically conducted for six to eight weeks before the scheduled match and involves a training program including treadmills used to run and exercise the dogs away from public view; weight pulls used to increase the dog’s strength and stamina; devices such as “spring poles” and “flirt poles” to build jaw strength and increase aggression; and the administration of drugs, vitamins, and other medicine. Some of the drugs used include steroids to build muscle mass and aggression. Dogs matched for future fights are expected to achieve their established target

weight by the scheduled match, much like in human boxing matches, requiring close attention to a dog's routine. Training can take place at a dogfighter's "yard" or indoors away from public view.

8. Generally, dogfighters fight dogs with a goal of obtaining "Champion" or "Grand Champion" status for their dogs, which is achieved by winning three or five fights, respectively. Individuals who own fighting dogs often try to maintain records of their dogs' success in fighting, at least partly because the offspring of fighting dogs can be sold at higher prices based on the documented success of the parents. One website on which dogfighters post pedigrees to demonstrate the fighting lineage of their dogs is <https://www.apbt.online-pedigrees.com/>. On this site, pedigrees are searchable by a variety of parameters and are routinely marked with codes to signify dogs' fighting results, such as "1XW," "2XW," "CH.," and "GR. CH.," which signify a one-time dog-fight winner, a two-time dog-fight winner, a champion, and a grand champion, respectively. "OTC" refers to fights that were conducted "off-the-chain"—that is to say, a less formal fight, conducted without the prior preparation of a "keep." "GIS" refers to an award for the most "game" dog in a particular card of dogfights.

B. The DMV Board

9. It can be challenging for dogfighters to find an opponent with a dog of the same weight and sex who is looking to fight that dog at the same time of year, and for a wager that is mutually agreeable to both parties. For that reason, dogfighters rely heavily on each other and on extensive networks of contacts to find an opponent. The practice is known as "calling out a weight." Dogfighters often "call out a weight" to known dogfighters in several states to increase their odds of finding a match. "Calling out a weight" is often done over the internet, which is an instrumentality of interstate commerce.

10. Telegram is a multi-platform messaging application that can be downloaded on to iOS and Android devices.

11. To maintain contact with each other to discuss dogfighting, to exchange videos about dogfighting, and to arrange dogfights away from the view of law enforcement, the defendants and their conspirators created private groups on Telegram that they collectively referred to as the “DMV Board” or the “Board” (hereinafter, the “DMV Board”). The “DMV” designation referred to the common location of many members of the group in the District of Columbia, Maryland, and Virginia. The DMV Board had as many as 28 members at one time, and its members used the DMV Board to communicate about dogfighting with each other daily, often throughout the day.

12. The following defendants (whose names will hereinafter appear in bold font and capital letters) and unindicted conspirators were members of, or otherwise associated with, the DMV Board:

Name	Alias(es)	Hereinafter
Bashawn Allen	Bey, 425, 425 Money Boy\$	ALLEN
Larry Alston	Big Goon	ALSTON
Charles Edward Davis, Jr.	Cat Daddy, Deep in the Game	DAVIS
Eldridge Jermaine Jackson	Big Head, 4bhead, 4b	JACKSON
Mark Joseph Rodriguez	Slow Poke	RODRIGUEZ
Dandre Patrick Wallace	Abstract	WALLACE
Isaac Jermaine Weathersby	Big Fist, CROUSA, KingCro TC, Team CRO	WEATHERSBY
Derek Garcia	Fatal Attraction	Garcia
Carlos Harvey	Roc9, Los	Harvey
Shaborn Nesbitt	The God I Am, Mike Honcho, Shy	Nesbitt
Rodriguez Norman	Tough Love	Norman
Ricardo Thorne	Rip, Darkside	Thorne
Laron West	Get Sick, Frog	West
Charles Williams, III	Never Say Never, Chucky	Williams
Tarry Wilson	City Limits, TJ	Wilson

COUNT ONE
(Dogfighting Conspiracy)

1. The general allegations of this Superseding Indictment are realleged and incorporated into this count as though fully set forth herein.

2. From in and around 2008, and continuing through the present, in the Eastern District of Virginia and elsewhere, the defendants,

BASHAWN ALLEN, a/k/a “Bey,” “425,” and “425 Money Boy\$,” of Trenton, New Jersey;

LARRY ALSTON, a/k/a “Big Goon,” of Windsor Mill, Maryland;

CHARLES EDWARD DAVIS, JR., a/k/a “Cat Daddy” and “Deep in the Game,” of Woodbridge, Virginia;

ELDRIDGE JERMAINE JACKSON, a/k/a “Big Head,” “4bhead,” and “4b,” of Washington, D.C.;

MARK JOSEPH RODRIGUEZ, a/k/a “Slow Poke,” of Woodbridge, Virginia;

DANDRE PATRICK WALLACE, a/k/a “Abstract,” of Washington, D.C.;

and

ISAAC JERMAINE WEATHERSBY, a/k/a “Big Fist,” “CROUSA,” “KingCro TC,” and “Team CRO,” of High Point, North Carolina;

did knowingly and unlawfully combine, conspire, confederate, and agree with one another and others, both known and unknown to the Grand Jury, to commit the following offenses:

- a. to sponsor and exhibit dogs in animal fighting ventures, in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 49(a);
- b. to sell, buy, possess, train, transport, deliver, and receive dogs for purposes of having the dogs participate in animal fighting ventures, in violation of

Title 7, United States Code, Section 2156(b), and Title 18, United States Code, Section 49(a); and

- c. to use instrumentalities of interstate commerce for commercial speech for purposes of advertising animals for use in animal fighting ventures, promoting and in other manners furthering animal fighting ventures, in violation of Title 7, United States Code, Section 2156(c), and Title 18, United States Code, Section 49(a).

Ways, Manner, and Means of the Conspiracy

The manner and means by which the defendants and their conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

1. It was a part of the conspiracy that the defendants and their conspirators bred, trained, and used pit bull-type dogs for dogfights.
2. It was a further part of the conspiracy that the defendants and their conspirators agreed to breed their pit bull-type dogs to one another's pit bull-type dogs in the hopes of producing champion fighting dogs.
3. It was a further part of the conspiracy that the defendants and their conspirators traveled to dogfights held at properties owned and/or arranged by themselves or other conspirators.
4. It was a further part of the conspiracy that the defendants and their conspirators bet on dogfights in which were entered dogs bred, trained, or owned by the defendants and their conspirators.
5. It was a further part of the conspiracy that the defendants and their conspirators used cell phones and direct messages to discuss dogfights, dogfighting, breeding fighting dogs,

training techniques to maximize their chances of developing champion fighting dogs, and methods to avoid being caught by law enforcement.

6. It was a further part of the conspiracy that the defendants and their conspirators posted the names, photos, and lineages of their fighting dogs on websites that tracked pedigrees of fighting dogs.

7. It was a further part of the conspiracy that the defendants and their conspirators created and used the DMV Board as a place where they and their associates could exchange videos about dogfighting; discuss training techniques to develop successful fighting dogs; and arrange, coordinate, watch, discuss, and bet on dogfights, all away from the view of law enforcement authorities.

8. It was a further part of the conspiracy that, on the DMV Board, the defendants and their conspirators used the names of their dogfighting operations and/or kennels to refer to themselves as well as to their dogfighting operations and/or kennels.

9. It was a further part of the conspiracy that the defendants and their conspirators used the DMV Board to discuss the proper procedures for officials to use at dogfights, and to recruit referees to officiate at dogfights.

10. It was a further part of the conspiracy that the defendants and their conspirators used the DMV Board to compare methods of killing dogs that lost fights.

11. It was a further part of the conspiracy that the defendants and their conspirators used the DMV Board to discuss which dogfighters could be trusted to join the group, to circulate media reports about dogfighters who had been caught by law enforcement, and to discuss methods to minimize the likelihood that they would be caught themselves.

Overt Acts

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants and their conspirators committed overt acts including but not limited to the following:

1. On or about August 11, 2008, conspirator Norman, a/k/a “Tough Love,” posted to a website tracking pedigrees of fighting dogs a modification to a page with a photo and information for his fighting dog “Tough Love’s Freak Nick,” characterizing the dog as the offspring of “Tough Love’s Betty the Body” and “CH Deep in the Game Kennel’s Luchi” (itself the offspring of “Deep in the Game’s Nasty Girl”), a fighting dog owned by defendant **DAVIS, a/k/a “Cat Daddy.”**

2. On or about June 6, 2009, defendant **ALSTON, a/k/a “Big Goon,”** and/or conspirator West, a/k/a “Get Sick,” posted to a website tracking pedigrees of fighting dogs a photo and information for their fighting dog “Get Sick Goons,” characterizing the dog as the offspring of “Tha Goons Bell,” a fighting dog owned in part by defendant **ALSTON, a/k/a “Big Goon.”**

3. In and around March 2011, conspirators Wilson, a/k/a “City Limits,” and Williams, a/k/a “Never Say Never,” caused their dogs to engage in a fight.

4. On or about May 9, 2012, defendant **JACKSON, a/k/a “Big Head,”** and/or conspirator Williams, a/k/a “Never Say Never,” posted to a website tracking pedigrees of fighting dogs a photo and information for their fighting dog “4B & Never Say Never’s Gunner 1XW.”

5. On or about December 7, 2014, on a website tracking pedigrees of fighting dogs, defendant **ALLEN, a/k/a “Bey,”** noted that he acquired the fighting dog “425 KNL’s Morocco” from the kennel of conspirator Wilson, a/k/a “City Limits.”

6. On or about January 11, 2015, defendant **DAVIS, a/k/a “Cat Daddy,”** posted to a website tracking pedigrees of fighting dogs a photo and information for his fighting dog “Envy.”

7. On or about February 21, 2015, defendant **JACKSON, a/k/a “Big Head,”** posted to a website tracking pedigrees of fighting dogs photos and information for his fighting dogs “4b’s Crazy James” and “4b’s Widow,” and characterized them as the offspring of “4B Left-Eye,” who herself was characterized as the offspring of a champion fighting dog owned by conspirator Wilson, a/k/a “City Limits,” and a descendant of the champion fighting dog “4b & Never Say Never’s Gunner 1XW” owned jointly by defendant **JACKSON, a/k/a “Big Head,”** and conspirator Williams, a/k/a “Never Say Never.”

8. On or about April 8, 2015, defendant **JACKSON, a/k/a “Big Head,”** posted a modification to a website tracking pedigrees of fighting dogs a photo and information for his fighting dog “4b’s Lil Sinner,” and characterized her as another offspring of “4B Left-Eye.”

9. On or about April 17, 2015, defendant **RODRIGUEZ, a/k/a “Slow Poke,”** texted dogfighter Justin Love that the owner of a female dog that won a match in six minutes was looking for another opponent at 38 or 39 pounds to fight in eight weeks for a stake of \$5,000, and that Love should let defendant **RODRIGUEZ, a/k/a “Slow Poke,”** know if Love knew of anyone who might be willing to enter a dog in such a match.

10. On or about May 23, 2015, conspirator Wilson, a/k/a “City Limits,” posted to a website tracking pedigrees of fighting dogs a photo and information for his fighting dog “City Limits Beans 1XW (OTC),” characterizing the dog as the offspring of “Gunner 1XW,” a dog jointly owned by him and defendant **JACKSON, a/k/a “Big Head.”**

11. On or about May 31, 2015, defendant **RODRIGUEZ, a/k/a “Slow Poke,”** asked via text message whether Love was still interested in arranging a fight for Love’s 37-pound female dog.

12. On or about October 10, 2015, dogfighter Anthony Gaines told dogfighter Frank Nichols that even when he wins a dogfight, he sometimes does not come home with a dog because his dog dies as a result of the fight. Gaines said that, as a result:

[T]his is what I'm gonna start doing now. I got "Slowpoke" on speed dial. You know him? . . . he the vet tech . . . he charge me like 250, 300 to come to the show now, if you use him or not. . . . That how much it gonna cost you to come, so, and plus, you know, sometimes he might not charge you because he likes to go to shows anyway.

13. In a phone conversation on or about October 18, 2015, conspirator Thorne, a/k/a "Rip," told Gaines that conspirator West, a/k/a "Frog," had helped conspirator Wilson, a/k/a "City Limits," prepare his dog for a scheduled fight.

14. On or about October 22, 2015, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** texted Love that Love could call another dogfighter who went by "Inchell" and said that he would enter into a fight a 37.5-pound male dog for a stake of \$2,500.

15. On or about October 22, 2015, after Love and Gaines told defendant **RODRIGUEZ, a/k/a "Slow Poke,"** that they did not want to deal with "Inchell" and asked whether defendant **RODRIGUEZ, a/k/a "Slow Poke,"** knew of other possible matches for a 37- or 38-pound dog, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** told them that he had one possibility for such a match, but that the owner of that other dog would not want to fight without a bet of at least \$3,000.

16. On or about June 1, 2016, conspirator Garcia, a/k/a "Fatal Attraction," notified conspirator Norman, a/k/a "Tough Love," by direct message that Love, Gaines, and Nichols were among a group of individuals criminally charged with participating in a dogfighting ring.

17. On or about March 9, 2017, conspirator Norman, a/k/a "Tough Love," asked defendant **ALSTON, a/k/a "Big Goon,"** to agree that defendant **RODRIGUEZ, a/k/a "Slow**

Poke,” would be the referee for an upcoming dogfight they had arranged, saying “I don’t do shows without him.”

18. On or about March 13, 2017, conspirator Norman, a/k/a “Tough Love,” used a direct message to notify conspirator Williams, a/k/a “Never Say Never,” that, in light of the arrest of defendant **JACKSON, a/k/a “Big Head,”** the previous night, messages should be deleted from the DMV Board.

19. On or about April 20, 2017, conspirator Norman, a/k/a “Tough Love,” texted a DMV Board member, who had agreed to host a fight for him on June 3, 2017: “Just tell me how much per dog so I can let slo poke know.”

20. On or about April 30, 2017, defendants **ALSTON, a/k/a “Big Goon,”** and **ALLEN, a/k/a “Bey,”** entered their dogs into fights on the same card, in one of which “Tha Goon’s” dog “Ms. Flex” fought “Ruby,” a dog belonging to conspirator Norman, a/k/a “Tough Love.”

21. On or about May 11, 2017, defendant **ALLEN, a/k/a “Bey,”** used Telegram to circulate an offer to enter a 32-pound male dog into a fight for \$3,000.

22. On or about May 13, 2017, in response to a question from a dogfighter named “Ebo” regarding the identity of the referee for a fight set for July 7, 2017, with a stake of \$1,000, for a 37-pound female dog, defendant **DAVIS, a/k/a “Cat Daddy,”** texted that he was going to ask “Slow Poke” but that “Slow Poke” charged \$100 to referee a dogfight.

23. On or about May 13, 2017, a DMV Board member known as “Death Row Kennels” posted to the DMV Board that “if it’s slowpoke good” and that “[h]e was the ref” for the fight between a dog named “Gold Day” and a dog named “Eulogy” who was owned by defendant **ALLEN, a/k/a “Bey.”**

24. On or about May 21, 2017, defendant **ALLEN, a/k/a "Bey,"** used Telegram to solicit a fight for a 33.8-pound female dog for \$1,000.

25. On or about May 26, 2017, conspirator Norman, a/k/a "Tough Love," texted his opponent that he wanted defendant **RODRIGUEZ, a/k/a "Slow Poke,"** as the referee for a fight set for July 29, 2017, for 34-pound male dogs for a stake of \$3,500, with a forfeit fee of \$1,000, and characterized defendant **RODRIGUEZ, a/k/a "Slow Poke,"** as "the most recognized ref on the east coast."

26. On June 5, 2017, **DAVIS, a/k/a "Cat Daddy,"** sent a text message stating that "Slow Poke" and conspirator Garcia, a/k/a "Fatal Attraction," use **DAVIS's** on-line pedigree account, and that **DAVIS** used to let conspirator Norman, a/k/a "Tough Love" use it too.

27. On or about June 12, 2017, **ALLEN, a/k/a "Bey,"** posted to the DMV Board a link to an on-line pedigree and a description of his fighting dog "425 Money Boy\$ Eulogy Attack".

28. On or about June 18, 2017, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** posted to the DMV Board a detailed narrative of a fight that he had refereed between two 40-pound male dogs.

29. On or about June 21, 2017, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** posted to the DMV Board a series of Telegram messages displaying his displeasure that someone had reposted on Facebook the narrative of the fight he originally posted on the DMV Board, and his request that the members of the DMV Board refrain from reposting the narratives he posted to the DMV Board.

30. On or about June 21, 2017, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** responded to a post expressing disagreement with a ruling that he had made as a referee in a dogfight:

No problem. Not too many people agree when it doesn't go their way. It was something I saw and just asked that you not do it again. Nothing came out of it just trying to keep it fair. . . . I try my best to not pay attention to the people on the outside and can only use my best judgment. It's not always perfect from anyone in the box. We just try our best to keep as fair as possible.

31. On or about June 27, 2017, defendant **DAVIS, a/k/a "Cat Daddy,"** in a text to an unindicted conspirator, referred to a time that a dog named "Pee Wee" won a fight against a dog owned by defendant **RODRIGUEZ, a/k/a "Slow Poke,"** and conspirator Garcia, a/k/a "Fatal Attraction."

32. On June 30, 2017, after a DMV Board member asked "did he rat" in response to the posting to the DMV Board by defendant **RODRIGUEZ, a/k/a "Slow Poke,"** of an article about a defendant who pled guilty to dogfighting offenses in Puerto Rico, **RODRIGUEZ** responded "I don't know. Just passed it on as it was passed to me."

33. On or about July 9, 2017, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** posted to the DMV Board a correction to a narrative he previously had posted about another fight:

I need clear up a typo I made. On the first show it says "At 1 minute Katie starts to whine." I meant to say Bebe starts to whine. Katie never made a sound. I apologize to the parties that were involved. I have a corrected report if they need it resent.

34. On or about July 18, 2017, defendant **DAVIS, a/k/a "Cat Daddy,"** worked out logistics with defendant **RODRIGUEZ, a/k/a "Slow Poke,"** and conspirator Norman, a/k/a "Tough Love," for a fight to be held with a female dog belonging to defendant **DAVIS, a/k/a "Cat Daddy,"** at his residence in Woodbridge, Virginia, in the Eastern District of Virginia, on July 21, 2017, for a pot of \$500, with a \$500 forfeit fee.

35. On July 29, 2017, defendant **RODRIGUEZ, a/k/a "Slow Poke,"** posted to the DMV Board on Telegram the reason why he changed his method of posting fight results: "I had to start doing that so people wouldn't post it to public social media sites. Now I put that stamp on it so

whoever shares it we can trace it to them. If it comes from a board then we know that someone on that board can't be trusted.”

36. On or about October 13, 2017, defendant **WALLACE, a/k/a “Abstract,”** registered with a dog breeders’ association an identification chip or tattoo for his dog “Wallace’s Ranger,” who he previously identified on a website tracking pedigrees of fighting dogs as “Abstract’s Ranger 1XW (2XW OTC),” with references to having won three fights.

37. On or about December 20, 2017, defendant **WALLACE, a/k/a “Abstract,”** participated with conspirator Williams, a/k/a “Never Say Never,” in a dogfight.

38. On or about October 15, 2018, defendant **ALLEN, a/k/a “Bey,”** posted to the DMV Board photos of his dog that he claimed was going to be in “an all-out war” with a dog referred to as “that Rona gyp.”

39. On or about October 16, 2018, defendant **WALLACE, a/k/a “Abstract,”** forfeited a fight set up with defendant **JACKSON, a/k/a “Big Head,”** between 35-pound male dogs, because the former’s dog weighed too much.

40. On or about October 16, 2018, on the DMV Board, and after hearing that two dogs of defendant **WALLACE, a/k/a “Abstract,”** quit during dogfights, defendant **DAVIS, a/k/a “Cat Daddy,”** told defendant **WALLACE, a/k/a “Abstract,”** that “you understand that this is an illegal sport,” and that defendant **WALLACE, a/k/a “Abstract,”** should save himself money on dog food by killing the dogs that quit.

41. On or about October 16, 2018, defendant **WALLACE, a/k/a “Abstract,”** told defendant **JACKSON, a/k/a “Big Head,”** and other members of the DMV Board that he would kill his dogs only if they quit fights twice:

Ain’t nobody going to make me kill [expletive] unless them bitches die in the box or I feel like I want to kill them of my own recognizance. That’s

how that work. So, like I said, they my hounds. I pay the bill. I fit the bill. I give my hounds two tries. The first try is to introduce them to the [expletive] process. The second one, either you picked it up or you don't, bottom line. It is what it is.

42. On or about October 24, 2018, on the DMV Board, conspirator Williams, a/k/a "Never Say Never," told the members of the Board that:

This is a [expletive] board. Dog board. Overall, it's a dog board. . . . Man, who got some [expletive] dogs they trying to roll, man. Goddamn. [Epithet] on here [expletive] with these rolls. Damn. I need a bitch to roll on. Thirty-five, thirty-six, something. Somebody do me a favor. Abstract, you [expletive] this weekend or what? What we gonna do, [epithet]? Ain't nobody else trying to give me no havoc. Somebody do something. . . .

43. On or about October 26, 2018, defendant DAVIS, a/k/a "Cat Daddy," told the DMV Board that he planned to enter into fights dogs that he bred himself, but if they were "not that good," he would "knock them on the head" and start over.

44. On or about October 26, 2018, defendant DAVIS, a/k/a "Cat Daddy," posted to the DMV Board the news that a particular dog would be open to a fight at 41 pounds in January 2019 for \$20,000.

45. On or about October 29, 2018, defendant DAVIS, a/k/a "Cat Daddy," added an unindicted conspirator to the DMV Board, and notified the DMV Board that the unindicted conspirator had a 41-pound dog available to fight for any amount of money.

46. On or about November 1, 2018, defendant DAVIS, a/k/a "Cat Daddy," told the DMV Board that he had dogs that won two fights with no training other than weight-pulling.

47. On or about November 3, 2018, defendant DAVIS, a/k/a "Cat Daddy," posted a video of a fighting dog to the DMV Board with a text that said, "I won a lot of money with that dog!!"

48. On or about November 3, 2018, after DMV Board member “Only in America” posted a link to the online pedigree of “Deep in the Game’s Envy” (that was originally posted by conspirator Garcia, a/k/a “Fatal Attraction”), defendant **DAVIS, a/k/a “Cat Daddy,”** told the DMV Board that “Envy dog is my dog, man. Look on there. You see ‘Deep in the Game’s Envy’? I am Deep in the Game, dog.”

49. On or about November 4, 2018, in response to a text on the DMV Board that a fight arranged for 36.5-pound male dogs between conspirator Wilson, a/k/a “City Limits,” and the DMV Board member known as “Nephew the Genius” was now locked in, “Nephew the Genius” responded that they still had to see when defendant **RODRIGUEZ, a/k/a “Slow Poke,”** was available to be the referee.

50. On or about January 2, 2019, on the DMV Board, defendant **ALLEN, a/k/a “Bey,”** said that his champion fighting dog was ready to start the new year by fighting another “two-time winner or better” at 35 or 35.8 pounds.

51. In a phone conversation on or about January 15, 2019, conspirator Wilson, a/k/a “City Limits,” told conspirator Harvey, a/k/a “Roc9,” that he, conspirator Garcia, a/k/a “Fatal Attraction,” and defendant **DAVIS, a/k/a “Cat Daddy,”** would drive to Delaware for a fight on January 19, 2019, between his dog and one owned by defendant **WEATHERSBY, a/k/a “Big Fist.”**

52. On the DMV Board, on or about January 17, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** challenged defendant **WALLACE, a/k/a “Abstract,”** to pick a weight and a price, and set up a fight for one of his dogs for 10 weeks later.

53. On the DMV Board, on or about January 17, 2019, defendant **WALLACE, a/k/a “Abstract,”** played a recording of a dog owner asking that his dog be admitted to heaven, to

predict that the dog belonging to defendant **WEATHERSBY, a/k/a “Big Fist,”** would be killed during the fight scheduled for January 19, 2019, with a dog belonging to conspirator Wilson, a/k/a “City Limits.”

54. On the DMV Board, on or about January 17, 2019, in response to a news article posted on the DMV Board by defendant **DAVIS, a/k/a “Cat Daddy,”** regarding an individual charged with running a dogfighting operation, conspirator Wilson, a/k/a “City Limits,” warned, “People like dogs. They don’t like what we doing to them, though, I bet you that.”

55. On the DMV Board, on or about the morning of January 19, 2019, defendant **WEATHERSBY, a/k/a “Big Fist,”** boasted that his fighting dog “Freezer” won a second fight in 1 hour and 32 minutes.

56. On the DMV Board, on or about the evening of January 19, 2019, defendant **WEATHERSBY, a/k/a “Big Fist,”** said that he was giving a “play-by play” on a different board of the fight between his dog “Isis” and the dog owned by conspirator Wilson, a/k/a “City Limits.”

57. On or about January 19, 2019, after a dog owned by defendant **WEATHERSBY, a/k/a “Big Fist,”** and named “Team CRO USA ISIS” defeated a dog owned by conspirator Wilson, a/k/a “City Limits,” in a fight that lasted one hour and 12 minutes, conspirator Wilson, a/k/a “City Limits,” attempted to electrocute his dog but, when that failed, shot her.

58. On the DMV Board, on or about January 20, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** sent \$200 to defendant **WEATHERSBY, a/k/a “Big Fist,”** by CashApp to satisfy a bet made on the fight the night before against the dog owned by conspirator Wilson, a/k/a “City Limits.”

59. On or about January 20, 2019, on the DMV Board, defendant **ALLEN, a/k/a “Bey,”** confirmed that he had a fight scheduled with conspirator Wilson, a/k/a “City Limits”: “Yeah. We locked. I’m going to peel his face back. I’m going to eat his gums out. We locked.”

60. On the DMV Board, on or about January 23, 2019, defendant **WEATHERSBY, a/k/a “Big Fist,”** posted a video of him training a fighting dog on a treadmill.

61. On or about January 25, 2019, on the DMV Board, defendant **JACKSON, a/k/a “Big Head,”** said that he could arrange for dogfighters to use his mother’s property for dogfights because his mother loved him, and that he would kill with a sledgehammer any dog that refused to fight: “I’m gonna use that [expletive] sledge hammer. I’m telling you right now. You get down there and you’re down there and your dog don’t act like he want to fight? Boom! Side of the [expletive] head. Simple as that.”

62. On the DMV Board, on or about February 8, 2019, defendant **JACKSON, a/k/a “Big Head,”** told his fellow dogfighters that a dog in a fight should fight to the death: “[t]hat dog’s supposed to die in the [expletive] box.”

63. On or about February 8, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** told the DMV Board that he had seen at least two (and as many as five) dogs killed in dogfights in the last 18 months.

64. During a discussion on the DMV Board on or about February 8, 2019, defendant **WEATHERSBY, a/k/a “Big Fist,”** told defendant **JACKSON, a/k/a “Big Head,”** that he would accept a fight for his 32-pound dog with another dog that had won at least one previous fight.

65. During a discussion on the DMV Board on or about February 8, 2019, conspirator Garcia, a/k/a “Fatal Attraction,” offered to bet defendant **JACKSON, a/k/a “Big Head,”** \$100 that

a dogfight involving a dog belonging to defendant **WALLACE, a/k/a "Abstract,"** would last at least 30 minutes.

66. On or about February 8, 2019, defendant **WALLACE, a/k/a "Abstract,"** described on the DMV Board how his dog won the fight, and thanked defendant **DAVIS, a/k/a "Cat Daddy,"** for standing beside him as he prepared for the fight.

67. On the DMV Board, on or about February 8, 2019, conspirator Williams, a/k/a "Never Say Never," posted a direction for defendant **JACKSON, a/k/a "Big Head":**

Report to the board. I know you up, [expletive]. I know you heard them messages. Abstract pulled it off for you, Bighead. He pulled it off for you, baby. Leave that man alone, Bighead. And you owe out the ass, man. You owe [expletive] Abstract money. You owe Roy money. bills, [epithet]. Goddamn, [epithet]. Pay your [expletive] You losing like a [expletive]. You on a losing streak in betting. Get your ass to this board. Talk to me.

68. On or about February 8, 2019, defendant **WEATHERSBY, a/k/a "Big Fist,"** posted to the DMV Board congratulations to defendant **WALLACE, a/k/a "Abstract,"** for his dog's victory in a fight that day.

69. On or about February 9, 2019, defendant **JACKSON, a/k/a "Big Head,"** bragged on the DMV Board that "[w]e done had four rolls. We done had four matches. 4b them self bringing out a dog. Four dogs. Guess what, bro? We 4 and 0, bro, 4 and [expletive] 0."

70. On the DMV Board, on or about February 10, 2019, defendant **DAVIS, a/k/a "Cat Daddy,"** and conspirators Nesbitt, a/k/a "The God I Am," Garcia, a/k/a "Fatal Attraction," and Williams, a/k/a "Never Say Never," watched and discussed a dogfight won by a dog owned by defendant **WALLACE, a/k/a "Abstract,"** against a dog owned by defendant **JACKSON, a/k/a "Big Head."**

71. On or about February 10, 2019, defendant **JACKSON, a/k/a “Big Head,”** conceded on the DMV Board that his dog just lost a fight to a dog belonging to defendant **WALLACE, a/k/a “Abstract.”**

72. On or about April 25, 2019, defendant **WALLACE, a/k/a “Abstract,”** posted a photo and information on a website tracking pedigrees of fighting dogs for his fighting dog known as “Abstract’s China 1XW,” a dog who, in a fight against a dog owned by Wilson, a/k/a “City Limits,” was handled by defendant **DAVIS, a/k/a “Cat Daddy.”**

73. On or about May 22, 2019, defendant **WALLACE, a/k/a “Abstract,”** relayed to the DMV Board a solicitation for a fight for a 38-pound male dog, for \$500 or \$1,000.

74. On the DMV Board, on or about May 28, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** said that he had won with about 90 percent of the dogs that he ever bred, that he never had a dog that jumped out of the dogfighting box, and that he would not keep a dog that lost:

You’re either good or gone. I ain’t – ain’t no in between, man. These dogs cost too much money. And it’s an illegal sport. It’s kind of harboring a fugitive. Like, who would purposely harbor a fugitive knowing that if you get caught with the fugitive, you’re going to prison? Like, come on, man. That [expletive] don’t make sense. So, nah, you’re either good or gone, man.

75. On the DMV Board, on or about May 28, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** explained why he almost never videotaped his dogfights:

I took a video of one roll ever, ever, ever, ever, ever, ever. And that was a roll I did with Abstract with Panda. And I didn’t do that for me. I did that for Abstract. Like, I don’t record rolls. I don’t record matches. Like, come on, man. I can get in enough trouble on my own. I don’t need to add any incriminating evidence to myself. You know what I’m saying? You ain’t going to catch me red-handed with coke, dope, [expletive] everything under the sun. Like, nah, man, I’m not one of them. Come on, man. Not – I’m a smart criminal, man. Come on, man. You talking to the wrong one, man.

76. On the DMV Board, on or about May 29, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** said that “these dogs our [expletive] hobby, man, an illegal-ass hobby. And we all harboring fugitives at the end of the day.”

77. On or about May 29, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** posted on the DMV Board a link to a news article about a seizure of fighting dogs in Washington, D.C., and texted “too close to home.”

78. On or about May 30, 2019, after DMV Board members discussed a fight scheduled for the coming weekend, involving “Da Beast 2X B.I.S.,” a dog belonging to defendant **ALSTON, a/k/a “Big Goon,”** defendant **ALLEN, a/k/a “Bey,”** said that “I’m betting with the Goons on that one. I like Beastie.”

79. In a text message on or about June 13, 2019, defendant **DAVIS, a/k/a “Cat Daddy,”** invited conspirator Harvey, a/k/a “Roc9,” to meet at a specific address on Dillingham Square, in Woodbridge, Virginia, at 9:00 p.m., on June 15, 2019, to go from there to the site of a fight to take place that evening involving a dog owned by conspirator Wilson, a/k/a “City Limits,” but trained by defendant **DAVIS, a/k/a “Cat Daddy.”**

80. At approximately 8:45 p.m. on June 15, 2019, conspirator Williams, a/k/a “Never Say Never,” arrived at the address on Dillingham Square in Woodbridge, Virginia, that defendant **DAVIS, a/k/a “Cat Daddy,”** provided to conspirator Harvey, a/k/a “Roc9,” two days earlier, and did not return to his residence in Maryland until approximately midnight.

81. On or about June 23, 2019, defendant **RODRIGUEZ, a/k/a “Slow Poke”** met conspirator Harvey, a/k/a “Roc9,” in Woodbridge, Virginia, to sell him medications useful for patching wounds on a fighting dog, and told him that law enforcement probably learned about and raided his dog yard in 2018 as a result of the arrest of conspirator Williams, a/k/a “Never Say

Never,” in Philadelphia in 2018, and not because of the arrest of conspirator Norman, a/k/a “Tough Love,” in 2017.

82. On or about July 23, 2019, in a private chat on Telegram, defendant **DAVIS, a/k/a “Cat Daddy,”** and conspirator Nesbitt, a/k/a “The God I Am,” discussed buying semen for artificial insemination of their dogs from conspirator Garcia, a/k/a “Fatal Attraction,” and/or a relative of conspirator Norman, a/k/a “Tough Love.”

83. On or about July 31, 2019, in a private message on Telegram, defendant **DAVIS, a/k/a “Cat Daddy,”** notified conspirator Nesbitt, a/k/a “The God I Am,” that the DMV Board had been deleted from Telegram because a fighting dog of conspirator West, a/k/a “Get Sick,” was seized by law enforcement the previous day at the property of conspirator Thorne, a/k/a “Rip.”

84. On or about August 19, 2019, defendant **ALSTON, a/k/a “Big Goon,”** sent \$87.50 to defendant **DAVIS, a/k/a “Cat Daddy,”** by CashApp with the memo “Beastie forfeit up today.”

85. On or about August 22, 2019, in a private chat on Telegram, defendant **DAVIS, a/k/a “Cat Daddy,”** discussed with conspirator Nesbitt, a/k/a “The God I Am,” the possibility of purchasing from the latter property in North Carolina in order to keep fighting dogs in a location where defendant **DAVIS, a/k/a “Cat Daddy,”** would not be bothered by law enforcement.

86. On or about November 3, 2019, defendant **JACKSON, a/k/a “Big Head,”** kept his fighting dog “Anna Mae” on the property of conspirator Wilson in Warsaw, Virginia.

87. On or about November 30, 2019, defendant **JACKSON, a/k/a “Big Head,”** and at least one other member of the DMV Board attended a dogfight, at the end of which the losing dog was electrocuted with a car battery.

88. On or about February 13, 2020, defendant **JACKSON, a/k/a "Big Head,"** used Telegram to text to conspirator Wilson a video of himself training a dog on a treadmill for fighting in preparation for a fight with a dog belonging to defendant **DAVIS, a/k/a "Cat Daddy."**

89. On or about February 24, 2020, defendant **DAVIS, a/k/a "Cat Daddy,"** refereed a fight between a dog partially owned by defendant **JACKSON, a/k/a "Big Head,"** and a dog partially owned by defendant **ALSTON, a/k/a "Big Goon."**

90. On or about April 20, 2020, the dogfighter known as "North-South Walt" agreed to the proposal of conspirator Wilson, a/k/a "City Limits," that defendant **RODRIGUEZ, a/k/a "Slow Poke,"** be the referee for their upcoming fight, saying: "Slow Poke is a good friend of mine. Tell him North-South Walt. He refereed two of our uh two of our shows. One that we lost, and one we won. No. I don't mind."

91. On or about April 24, 2020, by a private message on Telegram, defendant **JACKSON, a/k/a "Big Head,"** told conspirator Wilson, a/k/a "City Limits," that he would attend a fight that conspirator Wilson, a/k/a "City Limits," had scheduled for his dog "Red Alert" on June 19, 2020, and/or a fight that conspirator Wilson, a/k/a "City Limits," had scheduled for his dog "Thor" on June 27, 2020.

92. On or about May 16, 2020, defendant **DAVIS, a/k/a "Cat Daddy,"** offered on the DMV Board to bet \$100 that "Peaches," a dog owned by defendant **WALLACE, a/k/a "Abstract,"** would defeat in a fight about to occur "Cardi-B," a dog owned by defendant **ALSTON, a/k/a "Big Goon,"** and "Tha Goons."

93. On or about May 17, 2020, conspirator Wilson, a/k/a "City Limits," posted to the DMV Board a narrative of the fight, which lasted one hour and 17 minutes, between "Peaches"

(owned by defendant **WALLACE, a/k/a “Abstract”**) and “Cardi B” (owned by defendant **ALSTON, a/k/a “Big Goon,”** and “Tha Goons”).

94. On or about May 19, 2020, defendant **WALLACE, a/k/a “Abstract,”** posted to a website tracking pedigrees of fighting dogs a photo and information for his fighting dog “Abstract’s Baby O (AKA Peaches) 1XW,” with a reference to the one hour and 17 minute duration of the fight two days earlier.

95. On or about June 2, 2020, defendant **ALLEN, a/k/a “Bey,”** posted to a website tracking pedigrees of fighting dogs information about the sale for \$2,000 each of the offspring of his fighting dog “Eulogy 5XW.”

96. On or about June 28, 2020, conspirator Garcia, a/k/a “Fatal Attraction,” posted on the DMV Board narratives of fights involving dogs belonging to defendant **ALSTON, a/k/a “Big Goon,”** conspirator Wilson, a/k/a “City Limits,” and an unindicted conspirator.

97. On or about June 28, 2020, defendant **JACKSON, a/k/a “Big Head,”** sent \$100 by CashApp to an unindicted conspirator with the notation “for Red Alert,” corresponding to the name of a dog owned by conspirator Wilson, a/k/a “City Limits,” who had just won a fight.

98. On or about July 12, 2020, defendant **ALLEN, a/k/a “Bey,”** posted to a website tracking pedigrees of fighting dogs information about his fighting dog “425 Money Boy\$ Draco 1XW 1WL,” characterizing the dog as offspring of dogs owned by conspirator Norman, a/k/a “Tough Love.”

99. On or about July 24, 2020, after an individual who distributed a magazine dedicated to dogfighting provided conspirator Wilson, a/k/a “City Limits,” with the names of conspirator Garcia, a/k/a “Fatal Attraction,” and defendant **RODRIGUEZ, a/k/a “Slow Poke,”** as references, conspirator Wilson, a/k/a “City Limits,” responded that he knew “Poke” and “Derrick [Garcia],

and we good friends together. So and the other people. Your people so. . . . I can trust all the people in your magazine, and they ain't gonna do me wrong.”

100. On or about July 28, 2020, defendant **WALLACE, a/k/a “Abstract,”** posted to the DMV Board a video of a dogfight, characterizing it as “a roll I did yesterday.”

101. On or about July 31, 2020, by private messages on Telegram, defendant **JACKSON, a/k/a “Big Head,”** notified conspirator Wilson, a/k/a “City Limits,” of the progress of his dog in training for a fight.

102. On or about August 5, 2020, defendant **ALSTON, a/k/a “Big Goon,”** used Telegram to solicit DMV Board member “CDK” and others for fights for a 42-pound male dog with a \$65,000 bet, and a \$1,000 forfeit fee; a 43-pound male dog with a \$35,000 bet and a \$750 forfeit fee; and a 28-pound female dog with a \$2,000 bet and a \$500 forfeit fee.

103. On or about August 20, 2020, conspirator Wilson, a/k/a “City Limits,” possessed at his residence in Warsaw, Virginia, fighting dogs and videos depicting him engaged in dogfighting with conspirator Williams, a/k/a “Never Say Never” (*see* Overt Act 3), defendant **WALLACE, a/k/a “Abstract”** (*see* Overt Act 37), and defendant **JACKSON, a/k/a “Big Head”** (*see* Overt Act 87).

104. On or about September 19, 2020, defendant **ALSTON, a/k/a “Big Goon,”** or another member of “Tha Goons,” posted to a website tracking pedigrees of fighting dogs information for the fighting dog “Goons Family Glock Gurl 100%,” characterizing the dog as the offspring of “4B’s Lil Sinner” (a fighting dog owned by defendant **JACKSON, a/k/a “Big Head,”** and a descendant of “City Limits (P-Roads) Buckshot 1XDGL,” a fighting dog owned by conspirator Wilson.

105. On or about June 13, 2021, defendant **ALSTON, a/k/a “Big Goon,”** received a private Telegram message from defendant **RODRIGUEZ, a/k/a “Slow Poke,”** consisting of a narrative of a fight involving “Amber,” a dog belonging to defendant **ALSTON** and “Tha Goons Kennel.”

106. On or about June 14, 2021, defendant **ALSTON, a/k/a “Big Goon,”** set a fight for August 28, 2021, for his 37.5-pound female dog for a pot of \$20,000 and a forfeit fee of \$2,000.

107. On or about July 18, 2021, defendant **ALSTON, a/k/a “Big Goon,”** received a private Telegram message from defendant **RODRIGUEZ, a/k/a “Slow Poke,”** consisting of a narrative of a fight involving “Firebitch 1XW,” a dog belonging to defendant **ALSTON** and “Tha Goons Kennel.”

108. On or about August 10, 2021, defendant **ALSTON, a/k/a “Big Goon,”** received a private Telegram message from defendant **RODRIGUEZ, a/k/a “Slow Poke,”** consisting of a narrative of another fight involving “Amber,” a dog belonging to defendant **ALSTON** and “Tha Goons Kennel.”

109. On or about September 6, 2021, defendant **ALLEN, a/k/a “Bey,”** posted a modification to information on a website tracking pedigrees of fighting dogs for his fighting dog “425 Money Boy\$ Hustle 2X,” characterizing the dog as having defeated in a fight the dog “Amber Rose” owned by defendant **ALSTON, a/k/a “Big Goon,”** and “Tha Goons.”

110. On or about September 14, 2021, when an individual seeking to breed fighting dogs asked defendant **DAVIS, a/k/a “Cat Daddy,”** whether there was any semen around from a fighting dog known as “Trilogy,” he referred the individual to defendant **RODRIGUEZ, a/k/a “Slow Poke.”**

111. On or about November 23, 2022, a member of the DMV Board posted messages to the DMV Board and to an online website tracking pedigrees of fighting dogs contending that two members of the DMV Board had acted as government informants in an investigation into the DMV Board's dogfighting activities.

(All in violation of Title 18, United States Code, Section 371.)

COUNTS TWO THROUGH FIVE
(Advertising a Dog For Use in an Animal Fighting Venture)

1. The general allegations of this Superseding Indictment, as well as the Overt Acts from Count One referenced below, are realleged and incorporated into these counts as though fully set forth herein.

2. On or about the following dates, in Woodbridge, Virginia, in the Eastern District of Virginia, and elsewhere, the following defendants did unlawfully and knowingly use an instrumentality of interstate commerce for commercial speech for purposes of advertising an animal for use in an animal fighting venture, promoting or in any other manner furthering an animal fighting venture, by making the following advertisement on the internet via Telegram, as described in the Overt Acts referenced below:

Count	Defendant	Date	Overt Act
2	CHARLES EDWARD DAVIS, JR., a/k/a "Cat Daddy" and "Deep in the Game"	October 26, 2018	44
3	BASHAWN ALLEN, a/k/a "Bey," "425," and "425 Money Boy\$"	January 2, 2019	50
4	DANDRE PATRICK WALLACE, a/k/a "Abstract"	May 22, 2019	73
5	LARRY ALSTON, a/k/a "Big Goon"	August 5, 2020	102

(All in violation of Title 7, United States Code, Section 2156(c), and Title 18, United States Code, Section 49.)

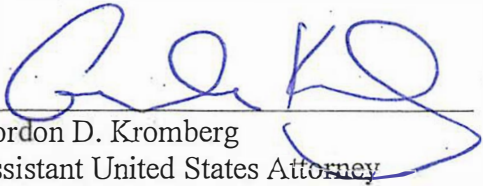
A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON OF THE GRAND JURY

Jessica D. Aber
United States Attorney

By:


Gordon D. Kromberg
Assistant United States Attorney